

**SEALED
FILED**

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

OCT 12 2023

UNITED STATES OF AMERICA,

Plaintiff,

v.

LANDON JOE BLACK,

Defendant.

SEALED

By _____
Deputy Clerk

Case No.

23 CR 183 JFH

INDICTMENT

The Federal Grand Jury charges:

COUNT ONE

**SEXUAL EXPLOITATION OF A CHILD/
USE OF A CHILD TO PRODUCE A VISUAL DEPICTION
[18 U.S.C. §§ 2251(a) & (e)]**

In or about April 2021, in the Eastern District of Oklahoma and elsewhere, the defendant, **LANDON JOE BLACK**, did employ, use, persuade, induce, entice, and coerce **MINOR VICTIM 1**, a minor, to engage in any sexually explicit conduct, as that term is defined in Title 18, United States Code, Section 2256(2), for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and such visual depiction was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and such visual depiction has actually been transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting

interstate and foreign commerce, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT TWO

**SEXUAL EXPLOITATION OF A CHILD/
USE OF A CHILD TO PRODUCE A VISUAL DEPICTION
[18 U.S.C. §§ 2251(a) & (e)]**

Between in or about May 2021, and in or about September 2021, in the Eastern District of Oklahoma and elsewhere, the defendant, **LANDON JOE BLACK**, did employ, use, persuade, induce, entice, and coerce MINOR VICTIM 2, a minor, to engage in any sexually explicit conduct, as that term is defined in Title 18, United States Code, Section 2256(2), for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and such visual depiction was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and such visual depiction has actually been transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT THREE

**ADVERTISEMENT OF CERTAIN MATERIAL INVOLVING
THE SEXUAL EXPLOITATION OF A MINOR
[18 U.S.C. §§ 2251(d) & (e)]**

Between in or about December 2021, and in or about August 2022, in the Eastern District of Oklahoma and elsewhere, the defendant, **LANDON JOE BLACK**, did knowingly make, print, and publish and cause to be made, printed, and published a notice and advertisement seeking and offering to receive, exchange, buy, produce, display, distribute, and reproduce any visual

depiction, the production of which involved the use of a minor engaging in sexually explicit conduct and which depicts such conduct, and such notice and advertisement was transported using a means and facility of interstate commerce and in and affecting interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Sections 2251(d)(1)(A) and (2)(B) and (e).

COUNT FOUR

**POSSESSION OF CERTAIN MATERIAL INVOLVING THE SEXUAL
EXPLOITATION OF A MINOR**
[18 U.S.C. §§ 2252(a)(4)(B) & (b)(2)]

Between in or about April 2021, and in or about December 2022, in the Eastern District of Oklahoma, the defendant, **LANDON JOE BLACK**, did knowingly possess and access with the intent to view, one or more matters which contained visual depictions the production of which involved the use of a minor engaging in sexually explicit conduct, as that term is defined in Title 18, United States Code, Section 2256(2), including visual depictions of prepubescent minors and minors who had not attained twelve years of age, and said visual depictions are of such sexually explicit conduct and had been shipped and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, and which was produced using materials which have been so shipped and so transported, by any means including by computer, in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

FORFEITURE ALLEGATION
[18 U.S.C. § 2253]

1. The allegations contained in Counts One through Four of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 2253.

2. Upon conviction of any of the violations charged in Counts One through Four of this Indictment involving violations of Title 18, United States Code, Sections 2251 and 2252 the defendant, **LANDON JOE BLACK**, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, any and all of the defendant's right, title and interest in:

- a) any visual depiction described in section 2251, 2251A, or 2252, 2252A, 2252B, or 2260 of Title 18, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received;
- b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained, directly or indirectly, from such offense; and
- c) any property, real or personal, used or intended to be used to commit or to promote and facilitate the commission of such offense or any property traceable to such property.

3. The property subject to forfeiture, pursuant to Title 18, United States Code, Sections 2253, includes, but is not limited to:

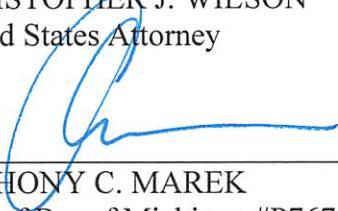
- Gigabyte Desktop Computer, Serial Number 18225G004500;
- Samsung Flash drive, 256 GB;
- Samsung MZ-75E500, Serial Number S466NX0M781592L;
- Western Digital WD30EZRX, Serial Number WCAWZ0935451;
- Apple model A1574 iPod, Serial Number CCQS54S8GGK4;
- Seagate Model ST96812AS Hard Drive, Serial Number 5PJ5EH05;
- NAS RAID enclosure, Serial Number 2028FD20190500087;
- Seagate model ST8000VN004 Hard Drive, 8TB, Serial Number WWZ1KP7Z;

- Seagate model ST8000VN004 Hard Drive, 8TB, Serial Number WWZ1KP3Q; and
- Seagate model ST8000VN004 Hard Drive, 8TB, Serial Number WWZ1GNBV.

A TRUE BILL:

Pursuant to the E-Government Act,
the original indictment has been filed
under seal in the Clerk's Office.

CHRISTOPHER J. WILSON
United States Attorney



s / Foreperson
FOREPERSON OF THE GRAND JURY

ANTHONY C. MAREK
State of Bar of Michigan #P76767
Assistant United States Attorney